

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

LANDSCAPE CONSULTANTS OF
TEXAS, INC., and METROPOLITAN
LANDSCAPE MANAGEMENT,
INC.,

Plaintiffs,

v.

CITY OF HOUSTON, TEXAS, and
MIDTOWN MANAGEMENT
DISTRICT,

Defendants.

Civil Action No. 4:23-cv-03516

**DECLARATION OF
ERIN E. WILCOX**

I, Erin E. Wilcox, declare as follows:

1. I am an attorney representing the Plaintiffs in the above-captioned case.

I am therefore personally familiar with the facts and circumstances of this case referenced herein, including the discovery process. I submit this declaration and attached exhibits in support of Plaintiffs' Opposition to Defendant City of Houston's Emergency Motion to Compel the deposition of Gerald Thompson.

2. Attached hereto as Exhibit 1 is Defendant City of Houston's Designation of Expert Witnesses. This document was emailed to Plaintiffs' counsel on July 31, 2024.

3. Attached hereto as Exhibit 2 is Defendant City of Houston's First Set of Interrogatories to Landscape Consultants of Texas, Inc., and Defendant City of

Houston's First Set of Interrogatories to Metropolitan Landscape Management, Inc.

This document was emailed to Plaintiffs' counsel on August 26, 2024.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 24th day of September 2024, at Austin, Texas.

/s/ Erin E. Wilcox
Erin E. Wilcox